

BEYS LISTON MOBARGHA & BERLAND LLP

JASON H. BERLAND

646.755.3604 (Direct)

jberland@blmblaw.com

November 25, 2015

VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square – Room 1106
New York, NY 10007

**Re: Sea Trade Maritime Corp. v. Coutsodontis, et al.; Index No. 09 Civ. 488 (LGS)
(HBP), Request For Extension**

Dear Judge Schofield:

We are counsel to Plaintiffs Sea Trade Maritime Corporation (“Sea Trade”) and George Peters (“Peters”) in the above referenced action. On October 1, 2015, the Court ordered that the parties’ motions in limine, as provided in the Court’s individual rules, shall be due November 30, 2015. Any responses to the motions shall be due December 9, 2015.

We respectfully request a brief one-week extension, until December 7, 2015, to file our motions. The responses would then be due on December 16, 2015. We are not asking for any extensions or adjournments concerning the other dates in the Court’s October 1st Order. This request is being made because the undersigned, who will be the lead trial counsel for Plaintiffs, just returned from two work-related trips, one overseas in Europe, for an internal financial investigation.

Although Plaintiffs are making this request, Defendants’ counsel has graciously consented to the request. This is Plaintiffs’ first request for an extension.

Respectfully submitted,

/s/Jason H. Berland

Jason H. Berland

Counsel for Plaintiffs

cc: All Counsel (Via ECF)